

Exhibit 5 – Engineering Statement
Addressing Continued Compliance with Radio Multiple Ownership Considerations
Application for Minor Change
prepared July 2020 for
Monticello Media LLC
WCHV(AM) Charlottesville, Virginia (Facility ID 19838)
1260 kHz 0.80 kW ND-D

Introduction

This **Statement** is supplied on behalf of *Monticello Media LLC*, (“*Monticello*”), licensee of Standard Broadcast Station WCHV(AM), Charlottesville, Virginia (FCC Facility ID 19838). *Monticello* requests a modification of license for WCHV(AM) which, if granted, would result in the simplification of the station’s antenna system (from directional to non-directional), a reduction in daytime operating power, and the deletion of nighttime operation. The resulting change in coverage of the WCHV(AM) 5 mV/m Daytime principal community contour is a slight reduction in area. *Monticello* presently has attributable ownership interest in six (6) radio stations in the vicinity of Charlottesville, Virginia. The instant Engineering Statement has been prepared using information provided by *Monticello* and their representatives to demonstrate *Monticello*’s continuing compliance with the Rules of the Federal Communications Commission as they govern common ownership of multiple radio stations serving the same market with regard to the stations listed below (“*Monticello* stations in the Charlottesville area”).

Monticello Radio Stations

Monticello holds attributable ownership in eleven (11) full service radio stations. Five of those stations are removed from the Charlottesville area, centered on Blacksburg, Radford, Pulaski & Christiansburg, Virginia. The principal community contours of these stations do not reach in to the Charlottesville area. In the Charlottesville, Virginia area, *Monticello* has attributable ownership in six (6) full service radio stations:

Call	Freq.	City, State	Fac. ID
WCHV(AM)	1260 kHz	Charlottesville, VA	19838
WKAV(AM)	1400 kHz	Charlottesville, VA	10651
WCHV-FM	107.5 MHz	Charlottesville, VA	61716
WCYK-FM	99.7 MHz	Staunton, VA	70861
WHTE-FM	101.9 MHz	Ruckersville, VA	56361
WZGN(FM)	102.3 MHz	Crozet, VA	11672

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Monticello Stations Not in Charlottesville Area

WRAD(AM)	1460 kHz	Radford, VA	73919
WBRW(FM)	105.3 MHz	Blacksburg, VA	5795
WPSK-FM	107.1 MHz	Pulaski, VA	48621
WRAD-FM	101.7 MHz	Radford, VA	73918
WVHK(FM)	100.7 MHz	Christiansburg, VA	69744

The Commission issued a Report and Order and Notice of Proposed Rulemaking (“R&O”)¹ for various multiple ownership issues. The R&O establishes a means of evaluating radio station multiple ownership issues utilizing existing Nielsen Audio^{®2} and BIA[®] MEDIA Access Pro^{TM3} market data for analysis of markets with established geographic boundaries.⁴ There is a separate “interim” means for evaluating radio station multiple ownership issues beyond established Nielsen Audio radio markets. At this time, pursuant to information provided by BIA, Charlottesville, Virginia is not a defined geographic market. Thus, use of the interim contour overlap method is applied herein to demonstrate that with the proposed modification to WCHV(AM), *Monticello* will continue to comply with FCC Radio Multiple Ownership Rules.

Pursuant to §73.3555 of the Commission’s Rules, the number of stations that a licensee may own is based on the total number of stations in that particular market, regardless of the study methodology employed. There is also a limit on how many stations each licensee may own in any one service (AM or FM).

- Markets with 45 or more stations are limited to 8 total stations and 5 in any one service.
- Markets with 30-44 stations are limited to 7 total stations and 4 in any one service.

¹ Report and Order in MB Docket No. 02-277 and MM Docket Nos. 01-235, 01-317, and 00-244, and Notice of Proposed Rulemaking for MB Docket 03-130 FCC-03-127, (adopted June 2, 2003)(released July 2, 2003).

² Nielsen Audio is a registered mark of Nielsen Holdings, N.V.

³ MEDIA Access Pro is a trademark of BIA[®] Financial Network Inc.

⁴ As an initial matter, the geographical boundaries of a market are established by reference to the boundaries of the markets established by Nielsen Audio. Within that market, the FCC requires that the BIA count of stations operating in the market be employed.

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- Markets with 15-29 stations are limited to 6 total stations and 4 in any one service.
- Markets with 14 or fewer stations are limited to 5 total stations and 3 in any one service, but not more than 50% of the market stations.

Interim Method - Introduction

Under the current Rules, any station with a principal community beyond the geographic boundary of a Nielsen Audio Metro shall be studied under the Commission’s “interim,” contour overlap methodology. A “market” is defined as the area encompassed by the principal community contours of radio stations for which common ownership is proposed⁵ and which have a mutual area of principal community contour overlap.

Interim Method – The Market

The principal community contours of the pertinent licensed *Monticello* stations forming the basis of the Market in this study are shown on the map in **Exhibit 5 – Figure 1** along with the proposed modification to the principal community coverage contour for WCHV(AM). The Market is defined as the principal community coverage of the six (6) *Monticello* stations which share some common overlap. The licensed and proposed principal community coverage contours of WCHV(AM) share some of that common overlap area. The common “core” overlap area shared by the six licensed *Monticello* stations is shaded in green on **Figure 1**. The portion of that green shaded area outlined in an orange and white line is the portion of the common overlap area that will remain with the proposed WCHV(AM) facility. The slightly reduced coverage relying upon measured ground conductivity data is considered herein. However the difference between the common overlap areas defined by the worst case measured data for the proposed WCHV(AM), the M-3 Data for the proposed WCHV(AM) and the licensed WCHV(AM) with M-3 data are inconsequentially similar.

⁵ Order in Implementation of Sections 202(a) and 202(b)(1) of the Telecommunications Act of 1996 (Broadcast Radio Ownership) FCC 96-90, released March 8, 1996 and Memorandum Opinion and Order in Revision of Radio Rules and Policies 7 FCC Rcd 6387, 6395 para. 39 (1992).

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Exhibit 5 - Figure 2 illustrates an “interim” study of the six (6) licensed stations sharing some common “core” overlap area. The “market boundary,” a composite of the perimeters of all six stations principal community contours, is shaded in yellow. The “core” common overlap area is shaded in green. Included on **Figure 2** are all of the neighboring full service radio station principal community coverage contours that overlap any portion of the market. **Figure 2** lists 11 AM stations and 24 FM stations that overlap some portion of the market. WYYD(FM), annotated G92, is shown, but excluded from the total count as it has a transmitter site more than 92 km from the core common overlap area of the market. Thus, there are a total of 34 stations in the market, six of which Monticello owns. *Monticello’s* existing ownership of six stations in Charlottesville, VA (WCHV(AM), WKAV(AM), WCHV-FM, WCYK-FM, WHITE-FM, and WZGN(FM)) continues to comply with FCC Rules, which state that a licensee may own up to six stations or four stations in any one service in markets with 15 to 29 stations. A station count of 34 exceeds the number of other stations needed to support ownership of six stations where four are in the same service.

Exhibit 5 - Figure 3 illustrates an “interim” study of WCHV(AM) as proposed with the other five (5) licensed *Monticello* stations sharing some common “core” overlap area. The “market boundary,” a composite of the perimeters of all six stations principal community contours, is shaded in yellow. The slightly reduced “core” common overlap area with the proposed WCHV(AM) (Measured Data) is shaded in orange. The yellow shaded market area is only slightly different on the eastern edge where the Licensed WCHV(AM) is no longer considered. Included on **Figure 3** are all of the neighboring full service radio station principal community coverage contours that overlap any portion of the market. There is no change in the number of stations overlapping the market. **Figure 3** lists 11 AM stations and 24 FM stations that overlap some portion of the market. WYYD(FM), annotated G92, is shown, but excluded from the total count as it has a transmitter site more than 92 km from the core common overlap area of the market. Thus, there are a total of 34 stations in the market, six of which Monticello owns. *Monticello’s* proposed continued ownership of six stations in Charlottesville, VA (WCHV(AM) (as proposed), WKAV(AM), WCHV-FM, WCYK-FM, WHITE-FM, and WZGN(FM)) continues to comply with FCC Rules, which state that a licensee may own up to six stations or four stations in any one service in markets with 15 to 29

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stations. Note that regardless of whether the Measured or M-3 ground conductivity data is relied upon to determine the proposed WCHV(AM) contour, the station count for either resulting market would be the same. A station count of 34 also exceeds the number of other stations needed to support ownership of six stations where four are in the same service.

Methodology

In preparing the attached maps and tables, pertinent station data were extracted from the Commission's engineering databases. For AM stations, these included the operating power, radiation efficiency, directional antenna data (where appropriate), and geographic coordinates. The distances to the 5 mV/m contours were then determined using the digitized version of the *Atlas of Ground Conductivity* published in 1981 by the International Telecommunication Union along with a computer program which simulates the FCC's AM groundwave propagation curves. For the FM stations, pertinent data for determining the distances to the contour included the antenna elevation above mean sea level, geographic coordinates, effective radiated power, and, where appropriate, directional antenna patterns. The requisite 3.16 mV/m (70 dBμ) contours were determined using digitized 3 arc-second U.S.G.S. terrain data along radials spaced every degree from the transmitter site and an implementation of the Commission's TVFMFS computer program which simulates the FM propagation curves. The detailed distances to the principal community contours were then used with a GIS mapping program to generate the attached maps.

Conclusion

As shown herein, with the proposed modification of WCHV(AM), *Monticello Media LLC*, continues to comply with §73.3555 of the Commission's Rules regarding the multiple ownership of radio stations WCHV(AM), WKAV(AM), WCHV-FM, WCYK-FM, WHITE-FM, and WZGN(FM). This conclusion was based on the interim, contour-overlap method.

Exhibit 5 - Map Figure 1
Principal Community Contours of Commonly Owned Stations of
Monticello Media LLC in the Charlottesville, Virginia Area
 prepared July 2020 for
 Monticello Media LLC
 WCHV(AM) Charlottesville, Virginia (Facility ID 19838)
 1260 kHz 0.80 kW ND-D

Green Shading
 Represents "Core"
 Common Overlap of
 Licensed Monticello Stations
 With Licensed WCHV(AM)

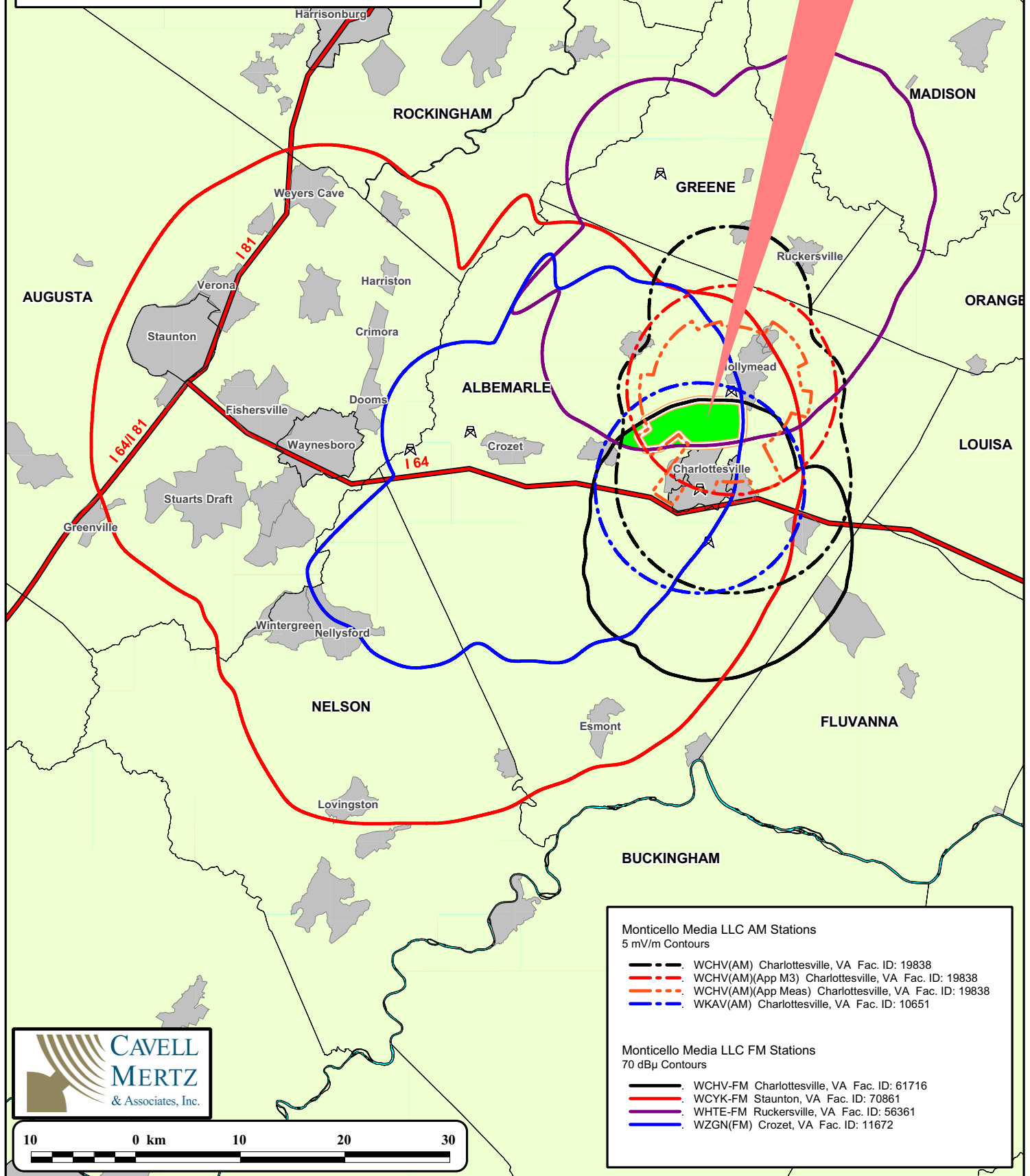


Exhibit 5 - Map Figure 2
Principal Community Contours of AM & FM Stations
Overlapping Market with Licensed WCHV(AM)
 prepared July 2020 for
 Monticello Media LLC
 WCHV(AM) Charlottesville, Virginia (Facility ID 19838)
 1260 kHz 0.80 kW ND-D

RAPPAHANNOCK

Green Dotted Arc represents 92 km
 from Core Common Overlap Area
 With Licensed WCHV(AM)

Green Shading Represents "Core"
 Common Overlap of
 Licensed Monticello Stations
 With Licensed WCHV(AM)

MADISON

GREENE

ORANGE

AUGUSTA

ROCKINGHAM

ALBEMARLE

NELSON

FLUVANNA

AMHERST

BUCKINGHAM

AM Stations Intersecting Market with Licensed WCHV(AM)
 5 mV/m Contours

- WCHV(AM) ** CHARLOTTESVILLE, VA Fac. ID: 19838
- WHBG(AM) HARRISONBURG, VA Fac. ID: 72143
- WINA(AM) CHARLOTTESVILLE, VA Fac. ID: 10649
- WKAV(AM) ** CHARLOTTESVILLE, VA Fac. ID: 10651
- WKCI(AM) WAYNESBORO, VA Fac. ID: 70862
- WKDW(AM) STAUNTON, VA Fac. ID: 11666
- WKTR(AM) EARLYSVILLE, VA Fac. ID: 73191
- WNLK(AM) CHURCHVILLE, VA Fac. ID: 48541
- WWSA(AM) HARRISONBURG, VA Fac. ID: 39493
- WTON(AM) STAUNTON, VA Fac. ID: 50077
- WVAX(AM) CHARLOTTESVILLE, VA Fac. ID: 161156

FM Stations Intersecting Market with Licensed WCHV(AM)
 70 dBu Contours

- WACL(FM) ELKTON, VA Fac. ID: 63491
- WBOP(FM) BUFFALO GAP, VA Fac. ID: 68304
- WCHV-FM ** CHARLOTTESVILLE, VA Fac. ID: 61716
- WCNR(FM) KESWICK, VA Fac. ID: 52394
- WCVL-FM CHARLOTTESVILLE, VA Fac. ID: 74161
- WCYK-FM ** STAUNTON, VA Fac. ID: 70861
- WHTF-FM ** RUCKERSVILLE, VA Fac. ID: 56361
- WJXX(FM) APPOMATTOX, VA Fac. ID: 36094
- WKCY-FM HARRISONBURG, VA Fac. ID: 41811
- WMRA(FM) HARRISONBURG, VA Fac. ID: 65447
- WMRY(FM) CROZET, VA Fac. ID: 6130
- WNRN(FM) CHARLOTTESVILLE, VA Fac. ID: 8710
- WPVA(FM) WAYNESBORO, VA Fac. ID: 53099
- WQMZ(FM) CHARLOTTESVILLE, VA Fac. ID: 10653
- WQPO(FM) HARRISONBURG, VA Fac. ID: 39492
- WSVO(FM) STAUNTON, VA Fac. ID: 11665
- WTJU(FM) CHARLOTTESVILLE, VA Fac. ID: 69145
- WTON-FM STAUNTON, VA Fac. ID: 50078
- WVTU(FM) CHARLOTTESVILLE, VA Fac. ID: 70344
- WVTW(FM) CHARLOTTESVILLE, VA Fac. ID: 63547
- WWRE(FM) BRIDGEWATER, VA Fac. ID: 73935
- WWWV(FM) CHARLOTTESVILLE, VA Fac. ID: 19837
- WYYD(FM) G92 AMHERST, VA Fac. ID: 74282
- WZGN(FM) ** CROZET, VA Fac. ID: 11672

**** Signifies Station Owned by Monticello**

**G92 for WYYD(FM) Signifies Station with
 Transmitter more than 92 km from Market Core
 (Thus Excluded from Market Count)**

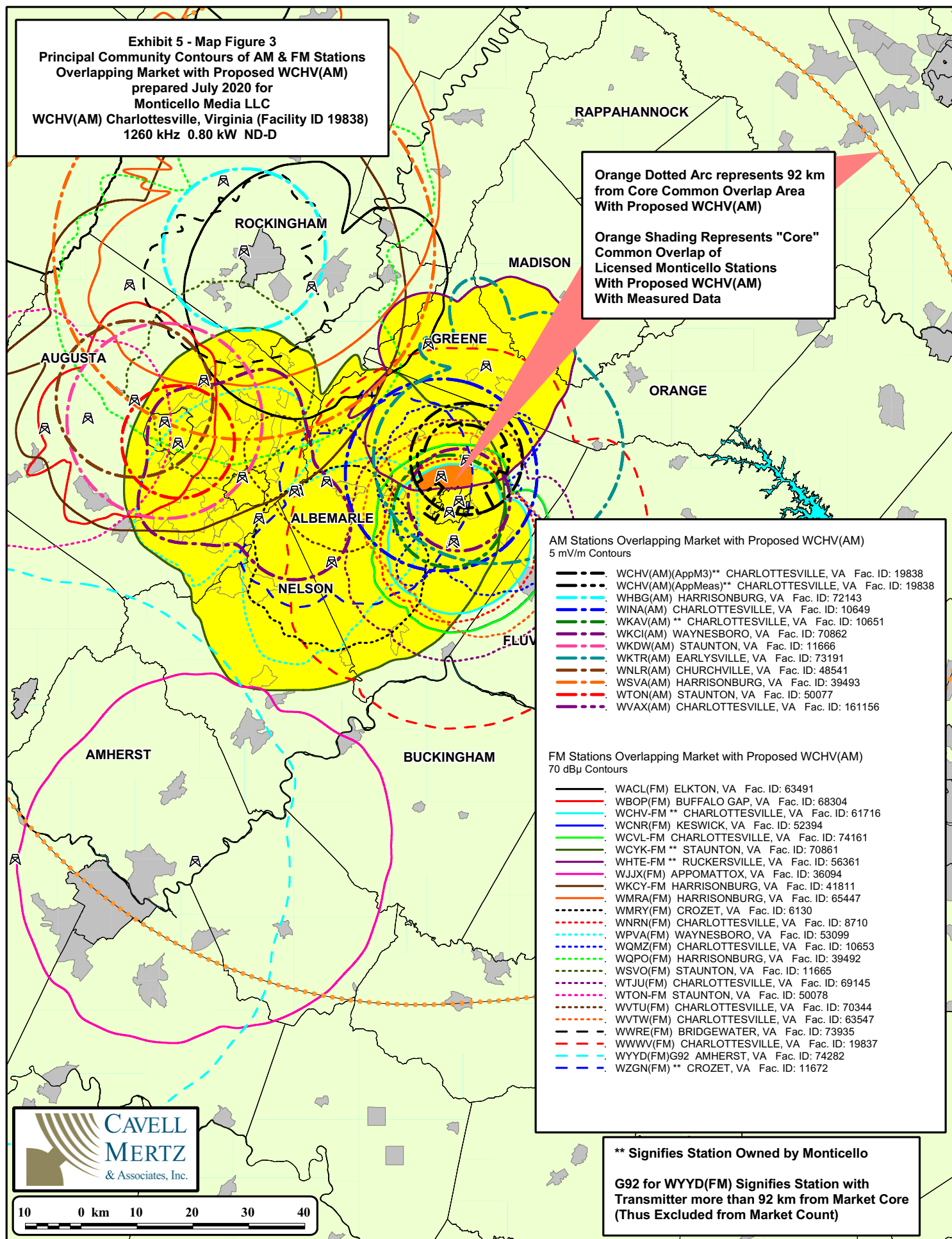


10 0 km 10 20 30 40

Exhibit 5 - Map Figure 3
Principal Community Contours of AM & FM Stations
Overlapping Market with Proposed WCHV(AM)
 prepared July 2020 for
 Monticello Media LLC
 WCHV(AM) Charlottesville, Virginia (Facility ID 19838)
 1260 kHz 0.80 kW ND-D

Orange Dotted Arc represents 92 km
 from Core Common Overlap Area
 With Proposed WCHV(AM)

Orange Shading Represents "Core"
 Common Overlap of
 Licensed Monticello Stations
 With Proposed WCHV(AM)
 With Measured Data



AM Stations Overlapping Market with Proposed WCHV(AM)
 5 mV/m Contours

- WCHV(AM)(AppM3)** CHARLOTTESVILLE, VA Fac. ID: 19838
- WCHV(AM)(AppMeas)** CHARLOTTESVILLE, VA Fac. ID: 19838
- WHBG(AM) HARRISONBURG, VA Fac. ID: 72143
- WINA(AM) CHARLOTTESVILLE, VA Fac. ID: 10649
- WKAV(AM) ** CHARLOTTESVILLE, VA Fac. ID: 10651
- WKCI(AM) WAYNESBORO, VA Fac. ID: 70862
- WKDW(AM) STAUNTON, VA Fac. ID: 11666
- WKTR(AM) EARLYSVILLE, VA Fac. ID: 73191
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- WSWA(AM) HARRISONBURG, VA Fac. ID: 39493
- WTON(AM) STAUNTON, VA Fac. ID: 50077
- WVAX(AM) CHARLOTTESVILLE, VA Fac. ID: 161156

FM Stations Overlapping Market with Proposed WCHV(AM)
 70 dBu Contours

- WACL(FM) ELKTON, VA Fac. ID: 63491
- WBOP(FM) BUFFALO GAP, VA Fac. ID: 68304
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